

The Honorable John C. Coughenour  
Magistrate Judge Briana Tshchida  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MS. NAOMI Sue White Eagle	NO. 2:24-CV-01388-JCC-BAT
PLAINTIFF	
V.	Amended Complaint
Washington State Depart	PER Document 39-2/28/25
ment of Corrections, et al	

"A Equal protection Claim"

This matter comes before this said court  
as a US 42 1983 Complaint, NO 2:24-CV-01388  
JCC-BAT Filed By plaintiff NAOMI Sue White  
Eagle - 855988 AS A CONDITIONS OF CONFINEMENT  
CASE OF WA State Department of Corrections  
et al. with Fourteenth Amendment, Due  
process, Equal protection, Eighth Amendment  
and violations of the Americans with  
Disabilities Act ("ADA") and presumably various  
state law claims. AS Ruling of said court  
plaintiff hereby comes with Amended Complaint  
AS court Ruled moving Forward with same

1  
2 Heading OF CASE AS A Conditions of Confinement  
3 Case, Leaving out parts AS ordered  
4 By court in Document 39, 2/28/25, And  
5 OR Rewrite, AS A lay person pro se, with  
6 known well documented mental Health  
7 Disabilitys That plaintiff Respectfully makes  
8 court known OF And That Said court  
9 should take into Account And also Courts  
10 Have Held pro se Complaints to Less Stringent  
11 standards then Formal pleadings drafted By  
12 lawyers, Courts Have also Held that they  
13 should Consider other documents A pro se  
14 prisoner HAS Filed In Addition to the  
15 complaint In determining whether the  
16 prisoner Has stated a Claim, As also is  
17 difficult For a prisoner to write a detailed  
18 Complaint then a lawyer or free person AS  
19 prisoners can't investigate before Filing,  
20 See, Rodriguez v. Plymouth Ambulance Service  
21 , 577 F.3d 816, 821 (7th Cir, 2009); Alston v.  
22 Parker, 363 F.3d 229, 233 . 6 (3d Cir, 2004)  
23 with said issues plaintiff will now Attempt  
24 Her very Best to Respectfull Satisfy Courts  
25 demands And state Her Claim, Thank you  
26 For Second chance, //

## JURISDICTION

plaintiff Brings this case to said courts jurisdiction due that all jurisdiction facts show cause that the United States District Court, Western District of Washington at Seattle does hold jurisdiction in plaintiffs case U.S., 42, 1983 complaint no 2:24-cv-01388-JCC-BAT

### "Plaintiff"

Ms. Naomi Sue White Eagle 855988  
 Monroe Correction Center at Twin  
 River's unit T.R.U. PO Box 888 Monroe  
 Washington 98272-0888

### "Defendants & Job Titles"

#1. Sheryl Strange, Head of the WA  
 State Department of Corrections

#2 Gary Bolton (Gary Bolton) Head of  
 WA State D.O.F Classification Board

#3 Keven Brown, the Supervisor of  
 Monroe Washington prison at T.R.U B unit

1 # 4. (Adalid Cardenas) Monroe complex  
 2 TREN Classification Counselor For B-unit

3

4 # 5. (Matthew Cossette) (JOB title - CS4)

5

6 # 6. T. Morrisey (JOB title SS) (S. Hanson)

7 (SOTAP JOB title)

8

9 # 7. S. Garner (INV3 - JOB title)

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11 # 8. D. FestAdmin (CBC JOB title)

12

13 # 9. R. Fall (CS4 JOB title)

14

15 # 10. L. Roberts - CPM - JOB title

16

17 # 11. Defendant J. Reynolds involved

18

19 # 12. J. Reynolds (involved)

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21

" EIGHTH Amendment "

22 # 1. Ms. Sheryl Strain is the Head  
 23 OF all WA D.O.C. Acting under color of  
 24 State. SHE'S in charge overlooking  
 25 All other defendants who made

26

27

1  
 2 The choice of keeping plaintiff (A  
 3 Full Female) housed at a all male  
 4 WA State Department of Corrections  
 5 prison, at M.C.C T.R.U., MS, Sheryl  
 6 Strange signed off keeping plaintiff  
 7 housed at a all male prison. that  
 8 shows Full cause of A EIGHT Amend  
 9 ment violation of plaintiffs constitutional  
 10 Rights, given By Law, knowing plaintiff  
 11 is in a unsafe placement, on 8/5/2024 is  
 12 Deliberate indifferent to plaintiff's Rights  
 13 # 2. Mr. Gary Bolton, Mr Gary Bolton  
 14 is the Head of WA State Department  
 15 of Corrections Classification Board, Mr.  
 16 Gary Bolton signed off A vote of keeping  
 17 plaintiff housed at Monroe correction  
 18 center T.R.U (M.C.C T.R.U) on 8/5/24,  
 19 A Violation of The Eighth Amendment  
 20 to the US Constitution knowing Full  
 21 well that plaintiff is A Female at  
 22 A male prison putting her in danger of  
 23 suffering or worse. Stop sexual HARASS-  
 24 ments & mental Abuse By male  
 25 prisoners. Mr. Bolton is deliberate indiff-  
 26 erent to plaintiff's Rights & Safety AS A  
 27 Human being, And AS a Female

# 3. Keven Brown

Keven Brown is and was the  
MCC TRU B-unit Supervisor at  
time of 6/10/2024, the Day plaintiff  
got Back From Having undergone Her  
Vasectomy Surgery From A.H.C. on  
said day Mr. Brown gave plaintiff His  
word that plaintiff would soon be  
transferred to W.C.C. (ORA Female prison)  
Because plaintiff is a Female, this  
transfer did not take place, plaintiff  
filed a Grievance, see Attachment #1

Mr. Keven Brown is in Violation  
of plaintiff's EIGHT Amendment Rights  
and Her Equal protection Rights  
& A.D.A Rights, plaintiff HAS Reported  
events of Harassment & Sexual  
Harassments and told Mr. Brown that  
she feels in danger and that the  
mental abuse from Harassment is  
hard for plaintiff. Mr. Brown knows  
plaintiff is a woman, and cares less  
of harm done by himself, Mr. Keven  
Brown signed a vote on 8.5-24 to  
keep plaintiff A MCC TRU, deliberate  
Indifferent to plaintiff's Rights & Safety

1 at a F, R, M, T Classification Hearing Held  
 2 on plaintiff's Housing plan again 8/5/24. This  
 3 came after Mr. Keven Brown had told the  
 4 plaintiff she would (soon) be transferred  
 5 to a Female prison to be housed among  
 6 all other females (such as herself).  
 7 See Attachment # 2. (The F, R, M, T Report)  
 8 also on about Mr. Keven Brown told  
 9 plaintiff she was denied transfer to  
 10 Female Housing because that she refused  
 11 to do a sex offender treatment  
 12 plaintiff is not convicted of a sex  
 13 crime and not court ordered, see  
 14 Attachment #

15

16

17 # 4 Defendant Mr. Addalid Cardenas,  
 18 Mr. Addalid Cardenas was working on  
 19 plaintiff's Classification and did attend  
 20 The F, R, M, T Hearing on 8/5/2024 and did  
 21 sign off on his vote keeping plaintiff  
 22 housed in a M, C, C T, R, M prison (A All male)  
 23 prison knowing plaintiff is fact a  
 24 Female Having Had Vaginoplasty surgery  
 25 done on 5/23/2024, Mr. Addalid Cardenas  
 26 is also in violation of plaintiff's Eight

27

28

1 Amendment Right to the us Consitution  
 2 And is deliberate indifferent to plaintiffs  
 3 Rights & safty & mental Abuse, The  
 4 Fourteenth Amendment, Due process,  
 5 Equal protection And (A, D, A) Americans  
 6 with Disabilities Act.

7  
 8  
 9 # 5 Defendant mathew cossette -  
 10 CS4 was at the Classification Hearing  
 11 And voted- Signed keeping plaintiff  
 12 Housed at MCC TRN a all male prison  
 13 knowing she is Female Acts of being  
 14 deliberate indifferent to plaintiff's safty &  
 15 mental Abuse (A Violation to the  
 16 Eight Amendment to the us Constitution,  
 17 The Fourteenth Amendment, Due process,  
 18 Equal protection, (A, D, A) Americans  
 19 with Disabilities Act. (Hearing date 8/5/24)

20  
 21 # 6 Defendant T. morrsey SS, was also  
 22 at Hearing Held on 8-5-2024 knowing  
 23 I am a Female voted to keep me  
 24 Housed at MCC TRN A All male prison  
 25 Awearying of safty issues And acted  
 26 deliberate indifferent to all needs  
 27 AS a woman violated my eight

1  
2 Amendment Right to the us Constitution  
3 - Fourteenth Amendment, Equal protection,  
4 (ADA) Americans with Disabilities Act

5  
6  
7 #7. Defendant S. Garner - INVS, was  
8 also at the FRMT Classification Hear  
9 ing held on 8-5-24, they voted to keep  
10 plaintiff housed at MCC TRY, knowing  
11 that plaintiff is a female offender  
12 and MCC TRY is a all male prison show  
13 ing deliberate indifference to plaintiff's  
14 safety & well being also violates her  
15 Eight Amendment Rights, Equal  
16 protection ADA and Fourteenth  
17 Amendment Rights

18  
19  
20 #8. Defendant D. Festadman C.B.C  
21 was also at the FRMT Classification  
22 Hearing and voted to keep plaintiff  
23 housed at MCC TRY all male prison  
24 being deliberate indifferent to her safety  
25 & well being a violation to the Eight  
26 Amendment to the us constitution,

1

2 # 9. Deffendant R. FALLS - CS 4 WAS ALSO  
3 AT THE FR.M.T CLASSIFICATION HEARING  
4 ON 8/5/25 AND VOTED TO KEEP PLAINTIFF  
5 HOUSED AT MCC TRY A ALL MALE PRISON  
6 KNOWING SHE IS A FEMALE, ACTING DILIB  
7 RATE INDIFFERENT TO HER WELL BEING AND  
8 SAFETY A VIOLATION TO HER EIGHT AMEND  
9 MENT RIGHTS & EQUAL PROTECTION,  
10 A.D.A FOURTEENTH AMENDMENT

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13

14 # 10 Deffendant L Roberts CPM WAS  
15 AT THE FR.M.T CLASSIFICATION HEARING HELD  
16 ON 8/5/25 AND VOTED TO KEEP PLAINTIFF  
17 HOUSED AT MCC TRY AN ACT OF DILIBRATE  
18 INDIFFERENCE TO PLAINTIFF'S SAFETY & WELL  
19 BEING AS A WOMEN AND VIOLATION OF  
20 EQUAL PROTECTION RIGHT A.D.A AND  
21 FOURTEENTH AMENDMENT

22

23 H

24 # 11. Deffendant J. Reynolds IS A  
25 CLASSIFICATION COUNSELOR AT M.C.C TRY  
26 B-unit, AND WAS PLAINTIFF'S ACTING

27

28

1 classification counselor on 8/5/24, and ms.  
2 Reynolds voted at said date at plaintiffs  
3 classification F.R.M.T Hearing to keep the  
4 plaintiff housed at MCC TRY (a prison for  
5 men only,) ms. Reynolds claims at time  
6 was because plaintiff would not do the  
7 SOTAP treatment for sex offender's  
8 knowing plaintiff is not a sex offender  
9 & not court ordered to do the SOTAP  
10 program, ms. Reynolds & all at said  
11 meeting of F.R.M.T on 8/5/24 is holding  
12 plaintiff at MCC TRY on account plaintiff  
13 refuses to do SOTAP see attach-  
14 ment # 2 lines 1-2-<sup>p 3</sup> For ms. Reynolds  
15 to vote keeping plaintiff housed at  
16 MCC TRY a all male prison knowing  
17 plaintiff is a female, and knowing  
18 the reported sexual harassments,  
19 mental abuse, plaintiff is subjected  
20 to by herself is deliberate indifference  
21 to plaintiff's safety & mental health  
22 & well being as a human being and  
23 a violation of plaintiffs eighth amendment  
24 to the us constitution

"Equal protection"

Defendant # 1, Ms. Sheryl Strange is in violation of plaintiff's Equal protection Rights and 14th Amendment Right to Plaintiff to Be treated the same as any other Female in the WA State Department of Corrections and to Be kept safe as a Female, Among other Female prisoners unto Equal protection to the Eight Amendment The violation comes by Defendant Ms Sheryl Strange being Head over all WA State Department of Corrections Being Held Responsible under color of state by her under employs & also signing to keep plaintiff a Female housed at MCC TRM A All male prison. The plaintiff suffers from known mental abuse from nonstop sexual harassment by male prisoners housed among, & MCC TRM IS also (A Sex Offender Treatment Center) common since knows a Female does not legally belong in a all male prison!

1 Defendant # 2 Mr Gary Bolton, Head  
 2 of the WA State D.O.C CLASSIFICATION BOARD  
 3 Mr. Bolton Signed OFF Vote on 8/5/24 to  
 4 keep plaintiff Housed at MCC TRY and  
 5 knowing plaintiff is a Female prisoner  
 6 in violation of Her Equal protection  
 7 to the eighth Amendment, knowing  
 8 unsafe issues & mental Harm done  
 9 and Being done to plaintiff due the  
 10 sexual HARASSMENT mental Abuse a  
 11 female must undergo Housed in  
 12 a male prison and in disregard to  
 13 plaintiff being a Female at Harm,  
 14 plaintiff Should Be Free From All Harassment, Humiliation,  
 15 INVASION OF PRIVACY et All unto RCW's per, RCW title 49, 49.60,  
 16 180, 49.60.030, 9A.36.080, 9A.80.010, 72.72.010 Eighth Amendment  
 17 Defendant # 3 Keven Brown the  
 18 MCC TRY B-unit supervisor at time  
 19 of 8-5-24 - when He signed A  
 20 vote at that F.R.M.T classification meeting to  
 21 keep plaintiff Housed at MCC TRY, Mr.  
 22 Keven Brown is most in disregards to  
 23 plaintiff's Rights & safety & well being due  
 24 plaintiff Had meeting with Mr Brown,  
 25 where plaintiff Reported Events of sexual HARASS-  
 26 ment & Threats, Being under Emotional &

1 mental distress Because of the whole of  
 2 Being Housed Among men at TRU (A All  
 3 male prison) plaintiff advised Mr. Brown  
 4 That she is fact now a Female and due  
 5 Being Housed at MCC TRU is suffering  
 6 a great deal of mental distress, Anxiety,  
 7 stress, at times almost unbearable mentally  
 8 & emotionally, So the violation of plaintiff's  
 9 Equal protection to the Eight Amend-  
 10 ment & 14th Amendment is due  
 11 that Mr Kevin Brown fully is aware  
 12 of harm done-being done By not following  
 13 WA state DOC policy Housing a Female  
 14 in a male prison in disregard to laws  
 15 & plaintiff right to be treated EQUAL  
 16 AS any other Female Housed in WA state  
 17 DOC Among other Females See, Pletka v.  
 18 Nix 957 Fed 1480 1484 - Being AS to  
 19 plaintiff's safety & to & For Equal Rights  
 20 & privileges, Fairness under the 8th & 14th  
 21 Amendment. Defendant Brown's Acts/Actions  
 22 or non Actions keeping plaintiff Housed at  
 23 MCC TRU a male prison, when plaintiff  
 24 should be Housed at a Female prison  
 25 gives Rise & claims unto indifference  
 26 depriving plaintiff of Fair Rights, See  
 27  
 28

1 RCW: Title 49 & that as to Kumer v. Bates  
2 Souvest INC 180 Wn.2d 481) citing 2020  
3 Ws Dist. Lexis 5) 2020 Ws. Dist Lexis 4)  
4 & that unto 18 USC § 242, 18 USC § 2340,  
5 plaintiff being housed in a male prison denies  
6 & keeps plaintiff from rights fairness &  
7 privileges that plaintiff would get being housed  
8 at a female prison with those similarly  
9 situated - females - as plaintiff is female)  
10 The disregard of plaintiff's rights causing emotional  
11 and mental distress, living in fear, is also  
12 violative of RCW: 51,24,020 as Mr Brown  
13 & defendants can not cause, create or  
14 do being violative of RCW: 51,24,020, all  
15 showing that defendant Kevin Brown  
16 violated - and ongoing plaintiffs  
17 Equal protection 8th Amendment  
18 Rights & 14th Amendment,

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22 Defendant # 4. Mr Adalid Cardenas is  
23 plaintiffs classification counselor, and was  
24 ~~not~~ at 8/5/2024 FRmt, But did vote  
25 at said FRmt Hearing to keep plaintiff  
26 housed at MCC thru all male prison.

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1 Mr. Adalid Cardenas Acts under color of state  
 2 By His vote to keep plaintiff housed at MCC  
 3 TRM all male prison on 8/5/24 at plaintiff's  
 4 FRM/T Classification Hearing Mr Cardenas is  
 5 in violation of plaintiff's Equal protection  
 6 Rights to the 8th Amendment to the  
 7 US Constitution & 14th Amendment.  
 8 Knowing plaintiff is a female & Having diss -  
 9 Regards to plaintiff's safety & mental &  
 10 emotional distress and sexual harass-  
 11 ment (well Documented Events) of past  
 12 years, on about 6/11/2024 - 6/18/2024  
 13 plaintiff also talked to Mr. Adalid Cardenas  
 14 Requesting to be Reclassified & Housed  
 15 at Any all Female WA State prison  
 16 to being proper & to be Housed in a Female  
 17 citing, Garner v. Giarrusso 571 F.2d 1330  
 18 1339 (5th Cir 1976) Hosrop v Board of Junior  
 19 College Dist. 515 523 F.2d 569 579-80 (7th  
 20 Cir 1975) Williams v. Matthews Co 499-  
 21 F.2d 819 829 (8th Cir 1974) & Seaton v Sky  
 22 Realty Co. 491 F.2d 634 636 (7th Cir 1974).  
 23 plaintiff makes known safety concerns &  
 24 well being - danger creation to live in  
 25 Fear is physical harm due loss of sleep  
 26 worry stress & thoughts of self harm  
 27 subjected to such is not Equal to Females  
 28

1 Housed at all Female prisons! Mr Car  
 2 dendenas Assured plaintiff that she was  
 3 soon to be transferred to WCCW a all  
 4 Female WA state prison for women  
 5 and then only to vote at the FRmt  
 6 Hearing on 8/5/24 to keep plaintiff  
 7 Housed at MCC TRM all male prison  
 8 where she remains, this lie that  
 9 was told to plaintiff Really did cause  
 10 a lot of stress & mental abuse,  
 11 waiting to go only not to cruel  
 12 and unusual treatment.

13  
 14  
 15  
 16 Defendant # 5 MATTHEW COSSETTE  
 17 CS4 - did attend the FRmt Classification  
 18 Hearing held on 8/5/24 unto plaintiff's  
 19 Housing et and on said date at said  
 20 Hearing did sign vote keeping plaintiff  
 21 Housed at MCC TRM all male prison  
 22 with disregards to plaintiff's well  
 23 being & Equal protection Rights to  
 24 the US Constitution 8th Amendment

Defendant # 6, T. Morrissey was at  
 the classification FRmt Hearing on  
 8/5/24 & Signed vote keeping plaintiff  
 Housed at MCC TRY knowing she is  
 Female and should be Housed at a  
 All Female prison for Her safety &  
 well being is a violation to plaintiff's  
 Equal protection Right to the US  
 Constitution's eighth amendment

Defendant # 7, S. Garner was also  
 at the classification Hearing Held on  
 8/5/24 of plaintiff's FRmt where  
 Garner voted to keep plaintiff Housed  
 at MCC TRY (See Attachment # A  
 Hearing Report) knowing plaintiff is  
 Female and Having disregards to Her  
 well being & Safety & pain & suffering  
 Left to deal with in TRY A Sex Offender  
 Treatment Center For Sex Offender  
 men is a violation to Her Equal  
 protection Rights to the 8th Amend  
 ment, & 14 Amendment

1 Defendant # 8, D. Festadman CBC  
 2 was at the FRMT CLASSIFICATION HEAR  
 3 on 8/5/24 where Festadman voted  
 4 keeping plaintiff housed at MCC  
 5 TRM a all male prison knowing  
 6 she is female Having no regards to  
 7 plaintiffs well being & EQUAL protect -  
 8 ion AS a female, IN violation to  
 9 Her EQUAL protection Rights to the  
 10 US Constitution 8th Amendment, to  
 11 not be treated fairly AS any other  
 12 female or to mental & emotional pain  
 13 on going

14  
 15

16 Defendant # 9, R. Fall (CS4 also did  
 17 vote at the Hearing on 8/5/24 a FRMT  
 18 CLASSIFICATION Hearing, Held on plaintiffs  
 20 Housing plan & et, His vote was to keep  
 21 plaintiff housed at MCC TRM all male  
 22 prison, knowing plaintiff had undergone  
 23 sexual Reassignment surgery and was  
 24 a female, with dis regards to her well  
 25 being and not treating her EQUAL to  
 26 any other female in WA state prison  
 27 was & is a violation to her EQUAL pro  
 28 tection Rights to the 8th Amendment

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4 Defendant # 10, L. Roberts - Acting  
 5 C.P.M did vote at a classification FRMT  
 6 Hearing on 8/5/24 keeping plaintiff Housed  
 7 at M.C.C TRU disregarding Fact that  
 8 plaintiff is Female And He Violated HER  
 9 EQUAL protection Rights to the 8th  
 10 Amendment to the US Constitution Be  
 11 -cause He treated HER unlike any other  
 12 Female By keeping HER at M.C.C TRU  
 13 Not caring if she is HARMED or OF the  
 14 emotionnal distress or mental Abuse  
 15 By Sexual HARASSment et that she  
 16 must endure (A Heartless Act) See  
 17 Attachment # The FRMT Report  
 18 His name Signed vote!

19

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21

22 Defendant # 11 J. Reynolds, ms.  
 23 Reynolds was & is Fully Aweare of  
 24 plaintiff's Situation Having Had HER  
 25 Sexual Reassignment Vaginoplasty  
 26 surgery done on 5/23/24 And is Fully  
 27 in Violation to plaintiff's EQUAL protection

28

1 Rights to the 8th Amendment & 14th.  
2 Ms. Reynolds was told by plaintiff that  
3 she needed to be treated same as any  
4 other female & be housed at a all female  
5 prison, / Ms. Reynolds still voted on 8/5/24  
6 at FRC hearing to keep plaintiff at  
7 MCC TRY (See Attachment # 1) with  
8 no care at all that plaintiff was suffer-  
9 ing mental & emotional abuse &  
10 Sexual Harassment from male prisoners  
11 plaintiff Reported such, take note to  
12 Attachment # 2 Page 1 Line 2 in  
13 where Ms Reynolds called plaintiff a  
14 man stating " His " A pronoun not  
15 lawful as plaintiff is female, this  
16 also gives Evidence that plaintiff  
17 is being mis treated Because in the  
18 minds of this Defendant she sees  
19 plaintiff as a male & not female  
20 And so dont treat Equal protection

## ADULTS with disability Act A.D.A Violations

# 1. plaintiff IS A Individual with  
 mental Disabilitys, see Attachment #  
 Lines 1- 17. Page 2. A psychological  
 Evaluation Report conducted By a Licensed  
 psychologist, Doctor Meg Manthos, done  
 on 8-27-2021. where in Her Report she  
 clearly states, (Quote) (Ms. White Eagle HAS  
 A History of producing I.Q Test Scores in  
 the borderline range and she both re-  
 ports & displays numerous symptoms consist-  
 ent with neurodevelopmental disorder, most  
 likely Autism spectrum disorder and/or  
 Attention disorder. Some of her symptoms  
 may overlap or be better explained by sch-  
 izophrenia or tardive dyskinesia, it  
 is recommended that Mrs White Eagle be  
 referred to a specialist in the assessment  
 and differentiation of these neurodevelop-  
 mental disorders to best accommodate  
 her mental health needs.

#. 2 - plaintiff HAS collected disability  
 (S.S.I) Federal Income for being mental  
 disabled since 1990 out in the  
 community.

1 plaintiff also Had, and will Have a mental  
 2 Health case manager, through mental  
 3 Health upon Her Return to the com-  
 4 -munity after Her Release FROM wa  
 5 state D.O.C, a public intity Services  
 6 And so court order By a state court  
 7 Judge in Her 2003 murder, 2 conviction  
 8 A crime that took place due her  
 9 mental disorder's at time.

10 Defendants et al, Have discriminated  
 11 Against plaintiff's mental disabilities By  
 12 Having no regards in Violating Her  
 13 Rights under the 8th & 14th Amend  
 14 ment. Acting in way that can treat  
 15 plaintiff Any kind's of unlawfull ways,  
 16 And not Be Held Accountible, due  
 17 is difficult for plaintiff to defend  
 18 Herself, due Her disabilities, and a  
 19 Violation of Her 8th Amendment AS  
 20 to Amount to Crule And Also Defendants  
 21 keep her Housed at MCC try stating in  
 22 part due she Has A 2003 murder-2  
 23 conviction Claiming she is violent  
 24 towards others Because of Her mental  
 25 Disability mental Health HOLDS Her in  
 26 male prison, plaintiff HAS undergone

27

28

1 intence mental Health counseling is not  
2 violent any more. By defendants agree-  
3 ing to This Disability Discrimination is  
4 a violation of Her 8th & 14 Amendment  
5 Rights to the US constitution & Abuse  
6 of A Disabled prisoner: Housing plaintiff  
7 At a All male prison at MCC T.R.M knowing of  
8 Her disabilities Being subjected to mental  
9 Abuse of Sexual Harassment, threats of  
10 bodily Harm daily some weeks Again  
11 is also discrimination An A.D.A Violation  
12 And or negligence, Defendants may Even  
13 Be Somewhat negligent in Failures to See  
14 That plaintiff A mental disabled Adult is  
15 Being Abused mentally at said all male  
16 prison MCC T.R.M by Staff under  
17 color of state & Inmate Harassments  
18 & emotional distress & Severe Plaintiff  
19 Crys at night often in Her cell after  
20 lock down & some days, this is in  
21 violation of 8th & 14 Amendment  
22 to Abuse A Disabled person in such A  
23 way is unlawful when an should be  
24 done is House plaintiff At a all Female  
25 prison (Any Female prison in WA  
26 state.) plaintiff did, exhaust Remedies  
27 or grievances see ~~att #1~~

## Relief

AS to That of being placed in a all Female prison, to be Treated Equal to all Other Females, Equal protection unto 8th & 14th Amended placed in all Female Housing prison, OR Released out into Community For safety & needed mental health care & support.

And ALSO For compensatory, punitive normal Relief / damages AS to Appropriate plaintiff States a Claim Asking For the sum of \$500,000 (Five Hundred thousand dollars) to be paid to the plaintiff, The plaintiff Respectfully seeking & requesting said court to Force Defendants to rightfully Honor plaintiffs demands of Relief Sought Herein,

plaintiff Hereby do Swear under penalty of perjury that all statements herein is true & correct signed this Day ~~3/7/2025~~<sup>N.W</sup> 3/7/25

Ms. Naomi Sue White Eagle

Ms. NAOMI Sue White Eagle

Date 3/12/2025

plaintiff ASK court Respectfully give the defendants 14 days to Respond.